

# **EXHIBIT 3**

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL  
SOFTWARE ANTITRUST LITIGATION  
(NO. II)**

**Case No. 3:23-md-3071  
MDL No. 3071**

**DEFENDANTS' MOTION TO  
DISMISS FOR LACK OF PERSONAL  
JURISDICTION AND IMPROPER  
VENUE**

**THIS DOCUMENT RELATES TO:  
3:23-CV-00440 [*Alexander*]  
3:23-CV-00742 [*Kabisch*]**

**Chief Judge Waverly D. Crenshaw, Jr.**

**DECLARATION FOR ESSEX PROPERTY TRUST, INC. IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION  
AND IMPROPER VENUE UNDER RULES 12(B)(2) AND (B)(3)**

I, Jessica Anderson, declare as follows:

1. I am the Senior Vice President, Property Operations at Essex Property Trust, Inc. ("Essex"), a position I have held since April 2021. I submit this declaration in support of Defendants' Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue. I am familiar with the locations of properties managed by Essex, and the general roles and responsibilities of Essex's property management employees. The facts stated herein are based on my personal knowledge and my review of records created and maintained by Essex.
2. Essex is incorporated in Maryland, with its principal place of business located at 1100 Park Place, Suite 200, San Mateo, California 94403.
3. Essex is not registered to conduct business in the State of Tennessee, conducts no business there, and has never conducted business there.

4. Essex has never owned or managed any properties in the State of Tennessee and does not otherwise have any operations there.

5. Essex has never employed any employee in the State of Tennessee.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 9, 2023, in Orange County, California.

  
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Jessica Anderson